

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANDREA SCHMITT; ELIZABETH
MOHONDRO; and O.L. by and through her
parents, J.L. and K.L., each on their own behalf,
and on behalf of all similarly situated
individuals,

Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN OF
WASHINGTON; KAISER FOUNDATION
HEALTH PLAN OF WASHINGTON OPTIONS,
INC.; KAISER FOUNDATION HEALTH PLAN
OF THE NORTHWEST; and KAISER
FOUNDATION HEALTH PLAN, INC.,

Defendants.

NO. 2:17-cv-01611-RSL

DECLARATION OF FRANK G. FOX
IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS
CERTIFICATION

I, Frank. G. Fox, Ph.D., declare under penalty of perjury and in accordance with
the laws of the State of Washington and the United States that:

1. I am over the age of 18, not a party in the case and competent to testify to
all matters stated herein. All statements are made upon my personal knowledge.

2. I am an economist with expertise in quantitative health care planning,
statistics and financial modeling.

3. *Exhibit A* attached hereto is a true and accurate copy of my Curriculum Vitae that details my professional background in health planning, statistics and finances.

4. My educational experience is as follows:

1977 Ph.D., University of Washington, Seattle, WA
(Economics)

1972 M.A., University of Washington, Seattle, WA
(Economics)

1970 B.A., University of Washington, Seattle, WA
(Economics)

5. I have owned and operated my own consulting firm since 1996, specializing in healthcare statistical analysis and the development of utilization and financial modeling and forecasting. I began my career in econometric modeling in the defense industry, preparing stochastic forecast models. I moved into health care economics in the early 1980s, first working in research and development, then in a large hospital organization as a health care planner, then in applied research and development. Since I have had my own consulting practice, I have provided healthcare planning, statistical analysis and financial simulation modeling to many of the hospitals in the State of Washington and in other parts of the country. I have also been engaged by numerous physician practices as an expert in health economics and financial/statistical modeling.

6. I have extensive experience with forecasting the need for hospital acute care beds, kidney dialysis centers, heart and liver transplant services, home health and hospice services, ambulatory surgery cases, clinical procedures such as GI procedures, cardiac surgery, epilepsy procedures, etc., and evaluating financial performance of health care entities. I have prepared a large number of simulation models for healthcare organizations to forecast utilization and financial performance for new technologies such as MRIs, linear accelerators and minimally invasive surgery, and for discrete projects

1 such as new hospitals, ambulatory surgery centers, urgent care centers, imaging centers,
2 and emergency departments. I have also prepared a large number of business plans for
3 many hospital services and programs. I have extensive experience in designing primary
4 research studies to ensure that the quantitative results generated from those studies
5 provide statistically meaningful results, *i.e.*, provide results that can be generalized to
6 the larger universe in a statistically valid way.

7 7. I have been qualified as an expert and provided expert testimony, either at
8 trial or in deposition in the following courts: (1) Federal District Court, Western District
9 of Washington (2022, 2020); (2) Federal District Court, Eastern District of Washington
10 (2019), (3) Federal District Court, Oregon (2006); (4) King County Superior Court,
11 Washington (2004); and (5) before Washington and Alaska state Administrative Law
12 Hearings (more than 20 cases between 2004-the present). I have also acted as an expert
13 consultant in the following: (1) numerous cases involving the acute care bed need
14 methodology required by the Washington Department of Health under the certificate-
15 of-need rules; (2) an anti-trust case in Oregon in 2008; (3) ambulatory surgery center
16 certificate-of-need cases in Washington; (4) kidney dialysis certificate-of need cases in
17 Washington; and (5) nursing home and hospice certificate-of-need cases in Washington.

18 8. At the request of Plaintiffs' attorneys, I created a statistical model using
19 data sources that are publicly available, as well as information from discovery produced
20 by Defendants. Based on my expert opinion, this information can be reliably used to
21 prepare statistically robust estimates of the number of enrollees who have been or are
22 insured under Defendants' Washington health insurance plans at any time on or after
23 October 30, 2014 to the present, and who required or require treatment for Hearing Loss
24 other than treatment associated with cochlear implants, or treatment associated with
25 Bone Anchored Hearing Aids (BAHAs). Under this model, using a conservative estimate
26

1 to model utilization of hearing aids,¹ I estimate that the proposed class includes over
2 four thousand enrollees who would be expected to utilize hearing aids in any given year.

3 9. Discovery from Kaiser included an analysis performed by Kaiser in 2020
4 that estimated between 3.4-4% of enrollees would utilize hearing aid coverage if that
5 benefit were added. Based on Kaiser's own analysis, the proposed class includes well
6 over 10,000 enrollees.

7 DATED: January 9, 2023, at Seattle, Washington.

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9 
10 Frank G. Fox, Ph.D.

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25 ¹ The number of insureds, by age cohort, by year, was provided by Defendant's legal counsel for the
26 coverage period. In 2020, the number of insureds equaled 281,884 persons.

Exhibit A

FRANK G. FOX, JR.

Contact Information: frankgfox@comcast.net

Telephone: 206.366.1550

Website: <https://healthtrends.consulting/>

Education

1977	Ph.D., University of Washington, Seattle, WA (Economics)
1972	M.A., University of Washington, Seattle, WA (Economics)
1970	B.A., University of Washington, Seattle, WA (Economics)

Professional Experience

May 1996 - Present **HealthTrends, Shoreline, WA**

Principal

Direct work with health care organizations in the development and implementation of actions to improve performance. This work is principally quantitative analysis and simulation modeling.

Projects include demand and financial modeling, including future year budget forecasts and business plan development; statistical survey research and analysis; strategic plan development; asset and program/service valuation, including physician practices and other businesses; new business development; joint ventures; compilation and analysis of information defining internal and market actions; medical staff development plans; technology acquisition/implementation; and expert consultation with clients regarding quantitative analysis and modeling, including evaluation of new technology. Significant expert testimony consultations regarding statistical and health care economics. Engagements have included:

- Development of demand and financial models for organization business planning and future year budgets. Includes developing databases and preparing models that simultaneously link “dependent” and “independent” variables that combined simulate utilization and financial projections. Includes preparing sensitivity analyses to test the effect of changes in key model variables on projected outcomes

- Development of financial statements, including income and expense, cash flow, asset depreciation and balance sheets. These schedules are used to define prior performance and model future growth. Includes engagements assisting small business “start-up” operations, including serving as chief financial officer, but in a consultant role
- Expert consultation regarding statistical/mathematical issues associated with clients’ surveys and other sampling work
- Primary and secondary survey research. Includes formulating best research design, developing survey questionnaires, utilizing in-person or other survey approach(es), preparing statistical analysis of survey responses and report preparation
- Preparation of volume and financial performance models for free-standing emergency departments, urgent care centers, medical clinics, imaging centers and ambulatory surgery centers. Includes preparation of demand and revenue forecasts by type of service, program or physician sub-specialty. Also includes estimation of direct and indirect expenses of business operations, including FTE (“full-time equivalent”) employment forecasts and capital expenditure modeling. Designed to identify key performance statistics and provide risk analysis of alternative utilization, reimbursement and expense scenarios
- Preparation of demand and financial models to define, evaluate and model demand and financial performance for new programs and technologies, e.g., transplantation programs including liver and pancreas transplantation; Gamma Knife program; PET scanner; minimally invasive surgery; and transcranial magnetic stimulation (“TMS”).
- Preparation of demand and financial models to evaluate current performance and prepare service/program forecasts. Representative projects include: imaging centers, including forecasts for all key modalities; emergency services; cardiac services; obstetrics and women’s’ services; sleep lab; oncology programs, including medical oncology and radiation therapy; and ambulatory surgery centers.
- Preparation of medical staff development plans, including integration of quantitative estimates of demand by specialty, current and projected supply, financial modeling, and qualitative interview research. Designed to assist organizations’ alignment/integration with physicians.
- Preparation of performance analyses, where client benchmarks are established and performance, measured. Examples include emergency department physicians, or

practicing physicians in a single or multi-specialty clinic. Work has included development and implementation of “production-based” compensation models.

- Preparation of valuation studies, which require assessment of “fair market value.” This includes contractual arrangements, where buyers must meet fair market value standard for federal statutes. It has also included preparation of fair market value estimates of physician practices.
- Preparation of strategic plans, including market demographic and economic profiles, organization performance data across key services/programs, including portfolio analysis, competitor analysis, and identification and prioritization of goals, strategies and implementation actions.
- Preparation of marketplace statistics on population, utilization and market share figures to assist organizations’ strategic planning and marketing programs.
- Expert testimony and deposition. I have been qualified and have testified as a statistical expert, an expert in economics and health economics, and a healthcare planning expert in a large number of courts-of-law. This includes deposition and expert testimony in the following: (1) Federal District Court, Western District of Washington (2022,2020); (2) Federal District Court, Eastern District of Washington (2019); (3) Federal District Court, Oregon (2006); (4) King County Superior Court, Washington (2004); and (5) before Washington and Alaska Administrative Law Hearings. The Washington Administrative Law Hearings included twenty-one separate Washington Department of Health Administrative Law Judge (“DOH ALJ”) Hearings—one in 2004, 2008, 2010, two cases in 2011, two cases in 2012, two cases in 2013, four cases in 2014, one case in 2015, two cases in 2016, two cases in 2018, two cases in 2020 and one case in 2021. There were two hearings before the Alaska Office of Administrative Hearings, one in 2016 and another in 2017.
- Expert consultation. I have acted as an expert consultant in the following cases: (1) numerous cases involving the acute care bed need methodology required by the Washington Department of Health under the certificate-of-need rules; (2) an anti-trust case in Oregon (2008); (3) ambulatory surgery center certificate-of-need cases in Washington; (4) kidney dialysis certificate-of need cases in Washington; and (5) nursing home and hospice certificate-of-need cases in Washington.
- Depositions, Expert Declarations, Expert Reports and Rebuttal Reports. I have provided expert declarations and/or expert reports and rebuttals in the following cases: (1) In 2018, I provided an expert declaration (“Declaration”) valuing the injunctive relief in a class action settlement in support of the motion for preliminary approval of that settlement in *Kerr v. Kaiser Foundation Health Plan*, Los Angeles Superior Court Case No. BC556863. (2) In May 2019, I provided a Declaration regarding models I prepared estimating

utilization and cost for selected treatments for patients with diagnoses identified in the California Mental Health Parity Act and substance abuse in *Ames v. Anthem Blue Cross Life & Health Insurance Company*, Los Angeles Superior Court Case No. BC591623. (3) In May 2019, I provided Declaration regarding estimates of the number of Plan insureds with a prevalence of Autism Spectrum Disorder (“ASD”) who utilized and expended monies for applied behavior therapy (“ABA”) in *JR v. CHI et.al.*, United States District Court, Western District of Washington, Seattle, No. 2:18:cv-01191-JLR. (4) In June 2019, I prepared an Expert Report in *DT v. NECA/IBEW Family Medical Plan, Civil Action No. 2:17-cv-00004 (RAJ)*, which estimated utilization and expenditures for ABA and/or physical therapy (“PT”), occupational therapy (“OT”) or speech therapy, for Plan insureds with a prevalence of ASD. (5) In July 2019, I prepared a series of Rebuttal Reports in *DT v. NECA/IBEW Family Medical Plan, Civil Action No. 2:17-cv-00004 (RAJ)*. (6) In January 2020, I provided a Declaration valuing coverage for residential treatment for insureds with eating disorders in a class action case in *Rea v. Blue Shield of California, Los Angeles Superior Court Case No. B468900*. (7) In July 2020, I prepared an Expert Report in *Crosby v. Blue Shield of California, Magellan Health, et. al.*, Case No.: 8:17-CV-01970-CJC-JDE; (8) In August 2020, I prepared a Rebuttal Report also for *Crosby v. Blue Shield of California, Magellan Health, et. al.*, Case No.: 8:17-CV-01970-CJC-JDE; (9) In October 2020, I prepared a Declaration in support of a motion for summary adjudication of Health Net’s fifth cause of action for intentional interference with contractual relations in *Dual Diagnosis Treatment Center Inc., v. Health Net, Los Angeles Superior Court, Case No. LC104357*; (10) November 2020, I provided a supplemental Declaration in *Rea v. Blue Shield of California, Los Angeles Superior Court Case No. B468900*; (11) In January 2022, I was deposed in in *Dual Diagnosis Treatment Center Inc., v. Health Net, Los Angeles Superior Court, Case No. LC104357*; (12) In June 2022, I was deposed in *Decision by the Department of Health Regarding Two Certificate of Need Applications Proposing to Establish Medicare and Medicaid Certified Hospice Services in Thurston County, No. M2021-923*; and (13-15) separately, I provided a Declaration, a Report and I was deposed in *C.P. v. Blue Cross Blue Shield of Illinois, Federal District Court, Western District of Washington, No.3:20-cv-06145-RBJ*.

- Preparation of Certificate of Need applications. Projects have included: (1) the development and operation of freestanding ambulatory surgery centers;(2) the purchase and sale of two hospitals in Eastern Washington in Spring 2003; (3) the development and operation of St. Anthony Hospital in Gig Harbor Washington in Fall 2003; (4) the development of a liver transplant program for Swedish Health Services in Seattle WA in Summer 2003; (5) the preparation of 3 kidney dialysis center applications in Spokane County, WA in fall 2003; (6) the preparation of a kidney dialysis center application in Clark County, WA in spring 2005; (7) the development and operation of a new hospital—Swedish Issaquah Hospital--in Issaquah Washington, submitted in 2004; (8) the development and operation of a freestanding hospital in Eugene Oregon, submitted in December 2005; (9) the expansion of acute care beds for St. Francis Hospital, Federal Way, WA submitted in late Fall 2006; (10) the build-out of a hospital tower and the expansion of licensed capacity by 166 acute care beds for Providence Regional Medical

Center in Everett WA this represented the largest expansion project in Washington CN history), also submitted in late Fall 2006; (11) the preparation of a certificate of need application for a 152-bed expansion and 21-bed NICU expansion for Sacred Heart Medical Center in Spokane WA, completed in February 2009; (12 & 13) the preparation of two certificate of need applications for percutaneous coronary intervention (PCI) programs at Stevens Hospital, Edmonds WA and Valley Medical Center, Renton WA—both applications were submitted in February 2009; (14) the preparation of a certificate-of-need application for a 27-bed NICU expansion Kadlec Medical Center, Richland WA, submitted in August 2009; (15) preparation of a certificate of need application for a 114-bed expansion project for Kadlec Medical Center, Richland WA, submitted November 2009; (16) preparation of a certificate of need application for a new 58-bed hospital in the Southeast Planning Area, submitted in December 2009; (17) preparation of a certificate of need request for Swedish Health Services' Lease of Stevens Hospital in Edmonds WA, submitted in May 2010; (18) preparation of a certificate of need for a 25-bed expansion of Mary Bridge Children's Hospital, submitted in July 2010; (19) preparation of a certificate of need request for pancreatic transplantation at Sacred Heart Medical Center; (20) preparation of a certificate-of-need request for a 20-bed expansion of Tacoma General Hospital's Neonatal Intensive Care Unit ("NICU"); (21) preparation of a certificate-of-need request for a 4-bed expansion of Tacoma General Hospital's Intermediate Care Nursery ("ICN"); (22) preparation of a certificate-of-need request for a 16-bed Intermediate Care Nursery ("ICN") at Swedish/Issaquah, submitted in January 2011; (23) preparation of a certificate-of-need request to operate an elective percutaneous coronary intervention ("PCI") program at Swedish/Issaquah; (24) preparation of a certificate-of-need request for an 11-bed expansion of Good Samaritan Hospital, submitted in June 2011; (25) preparation of a certificate of need for a 20-bed expansion of Mary Bridge Children's Hospital, submitted in October, 2011; (26) preparation of a certificate-of-need request for an ambulatory surgery center in Gig Harbor, Washington, submitted October 2011 (27) preparation of a certificate-of-need request for a new 30-bed psychiatric hospital in Everett, Washington, submitted November 2011; (28) preparation of a certificate-of-need request to operate an elective percutaneous coronary intervention ("PCI") program at Swedish/First Hill, submitted in February 2012; (29) preparation of a certificate-of-need request for an additional Level I rehabilitation beds at Providence St. Peter Hospital, submitted in March 2012; (30) preparation of a certificate-of-need request to lease Wenatchee Valley Hospital, submitted in September 2012; (31) preparation of a certificate-of-need request to lease United General Hospital, submitted November 2012; (32) preparation of a certificate of need to operate an ambulatory surgery facility, submitted in July, 2013; (33) preparation of a certificate of need application to operate three additional Level I rehabilitation bed at PeaceHealth St. Joseph Medical Center, Bellingham Washington, September 2013; (34) preparation of a certificate of need application to operate a kidney dialysis facility, submitted in January 2014; (35) preparation of a certificate of need to operate an ambulatory surgery facility, submitted in February 2014; (36) preparation of a certificate-of-need request for a new 34-bed psychiatric hospital in Monroe, Washington, submitted November 2013; (37) preparation of a certificate of need to operate a kidney dialysis facility, submitted in May 2014; (38)

preparation of a certificate of need for Level I rehabilitation beds for Wenatchee Valley Hospital, submitted November 2014; (39 and 40) preparation of two separate certificate of need applications to operate kidney dialysis facilities in different planning areas, submitted in November 2014; (41) preparation of a certificate of need application for a 120 bed psychiatric hospital, Tacoma Washington, submitted December 2014; (42) preparation of a certificate of need application to operate a kidney dialysis facility in Pierce County, submitted in February 2015; (43) preparation of a certificate of need application for an ambulatory surgery center for Swedish Health Services and Proliance, submitted in March 2015; (44) preparation of a certificate of need application for a 100-bed psychiatric hospital, Spokane County, submitted in June 2015; (45) preparation of a certificate of need to operate an ambulatory surgery center in Bellevue in East King Planning Area (2015); (46) preparation of a certificate of need to operate an ambulatory surgery center in Issaquah in East King Planning Area (2015); (47) preparation of a certificate of need to operate an ambulatory surgery center in Seattle in the North King Planning Area (2015); (48) preparation and submittal of a certificate of need application for MultiCare Good Samaritan Hospital for additional Level I rehabilitation beds (2015); (49) preparation and submittal of a certificate of need application for MultiCare Good Samaritan Hospital for additional acute care beds (2015); (50) preparation and submittal of a 100-bed psychiatric hospital certificate of need (Oregon) (2016); (51) preparation and submittal of a certificate of need to operate a kidney dialysis facility in Pierce County (2016); (52) preparation and submittal of a certificate of need to operate an 85-bed psychiatric hospital in Thurston County (2016); (53) preparation of a certificate of need to operate an ambulatory surgery center in Everett in the Central Snohomish Planning Area (2016); (54) preparation of a certificate of need to operate an ambulatory surgery center in the Grant County Planning Area (2016); (55) preparation of a certificate of need to operate an ambulatory surgery center in Okanogan County Planning Area (2016); (56) preparation of a certificate of need for approval of the purchase of Deaconess Hospital in the Spokane Planning Area (2017); (57) preparation of a certificate of need for approval of the purchase of Valley Hospital in the Spokane Planning Area (2017); (58) preparation of a certificate of need to operate an ambulatory surgery center in the Spokane County Planning Area (2017); (59) preparation of a certificate of need to operate an ambulatory surgery center in Central King County Planning Area (2017); (60) preparation and submittal of a certificate of need to expand a kidney dialysis facility in Grays Harbor County (2017); (61) preparation and submittal of a certificate of need to relocate and expand a kidney dialysis facility in Grant County (2017); (62) preparation and submittal of a certificate of need to operate an ambulatory surgery center in the East King Planning Area (2017); (63) preparation and submittal of a certificate of need to expand MultiCare Tacoma General Hospital's Level IV Neonatal Intensive Care Unit (NICU) (2018); (64, 65, 66, 67,68, 69) preparation and submittal of six separate certificates of need to expand kidney dialysis facilities in Pierce County (2018); (70 & 71) preparation and submittal of certificates of need to expand kidney dialysis facilities in Thurston County (2018); (72) preparation and submittal of a certificate of need to establish a kidney dialysis facility in Clark County (2018); (73) preparation and submittal of a certificate of need to expand a kidney dialysis facility in Grant County (2018); (74) preparation and submittal of a certificate of need to develop a

kidney dialysis facility in King County (2018); (75) preparation and submittal of a certificate of need to develop a kidney dialysis facility in Cowlitz County (2018); (76) preparation and submittal of a certificate of need to expand a kidney dialysis facility in Adams County (2018); (77) preparation and submittal of a certificate of need to expand a kidney dialysis facility in Okanogan County (2018); (78) preparation and submittal of a certificate of need to expand a kidney dialysis facility in Mason County (2018); (79) preparation and submittal of a certificate of need to expand a kidney dialysis facility Thurston County (2019); (80) preparation and submittal of a certificate of need to develop a kidney dialysis facility in King County (2019); (81) preparation and submittal of a certificate of need to expand a kidney dialysis facility (Benton County (2019); (82) preparation and submittal of a certificate of need to operate an ambulatory surgery center in the East King Planning Area (2019); (83) preparation and submittal of a 100-bed psychiatric hospital certificate of need (Oregon) (2019); (84) preparation and submittal of a certificate of need to expand an ambulatory surgery facility in East Pierce Planning Area (2019); (85)) preparation and submittal of a certificate of need to expand an ambulatory surgery facility in the East Pierce Planning Area (2019); (86) preparation and submittal of a certificate of need to expand an ambulatory surgery facility in East King Planning Area (2019); (87) preparation and submittal of a certificate of need to expand an ambulatory surgery facility in the Central Pierce Planning Area (2020); (88) preparation and submittal of a certificate of need to develop an elective PCI program in the Spokane County Planning Area (2020); (89) preparation and submittal of a certificate of need to relocate and expand a kidney dialysis facility Thurston County (2020); (90) preparation and submittal of a certificate of need to develop and operate a kidney dialysis facility in Yakima County (2020); (90) preparation and submittal of a certificate of need to relocate a dialysis facility in Mason County (2020); (92) preparation and submittal to expand a dialysis facility in Cowlitz County (2020); (93) Preparation and submittal to expand a dialysis facility in Stevens County; (94) preparation and submittal of a certificate of need to establish an ambulatory surgery facility in the East Pierce Planning Area (2020); (95) preparation and submittal of a certificate of need to operate a hospice agency in Spokane County (2020); (96) preparation and submittal of a certificate of need to operate a hospice agency in Thurston County Washington (2021); (97) preparation of a certificate of need application to relocate MultiCare Mary Bridge Children's Hospital in Tacoma Washington (2021); (98) preparations and submittal of a certificate of need application for the purchase of Capital Medical Center, Olympia (2021); (99) preparation and submittal of a certificate of need to establish an ambulatory surgery facility in the Spokane Planning Area (2021); (100) preparation and submittal to expand a dialysis facility in Grays Harbor County WA (2021); (101) preparation and submittal of a certificate of need to develop and operate a kidney dialysis facility in Yakima County (2021); (102) preparation and submittal to expand a dialysis facility in Cowlitz County (2021); (103) preparation and submittal of a certificate of need to purchase MPT ownership in Capital Medical Center building (2021); (104) preparation and submittal of a certificate of need to operate a hospice agency in Spokane County (105) preparation and submittal of a certificate of need to add licensed NICU bassinets to Mary Bridge Children's Hospital (2022); (106) preparation and submittal to add OR capacity to an ambulatory surgical facility in East Pierce County (2022; (107)

preparation and submittal for certificate of need approval to operate a two OR ambulatory surgery facility in Thurston County; (108) preparation and submittal of a certificate of need request to add 160 licensed acute care beds to Good Samaritan Hospital in Puyallup WA; (109) preparation and submittal to establish a 40-bed Level I rehabilitation hospital in Snohomish County (2022); and (110) preparation and submittal of submittal to establish an ambulatory surgical facility in Spokane County (2022).

- These projects included preparation of detailed utilization and financial performance models, including income and expense, cash flow statements, asset depreciation schedules and balance sheets. They also included preparation and submittal of complete applications to Washington Department of Health.

July 2001-July 2002 Clear Medical, Bellevue WA

Vice President, Finance and Chief Financial Officer

Financial stewardship for Clear Medical, Inc. This included developing and properly using financial reports and performance information, in aggregate, and at the product/service level, to monitor and improve company performance. Performance was measured for contribution margin, cash flow and return on investment. As the company's financial leader, responsible for daily fiscal activities and longer term financial viability and growth. Responsibilities included:

- Preparation of weekly and monthly financial reports for the chief executive officer, the Board of Directors, and other members of the executive team. Financial reports include income and expense statements, cash flow and balance sheet statements. These reports were compiled for year-to-date and annualized estimates.
- Preparation of monthly departmental budgets, then monitoring actual expenditures against budget estimates. Also responsible for budget forecasts, used to guide departmental growth.
- Preparation of 5-year forecast models to estimate financial performance and resource requirements.
- Correct daily operation of accounts payable and accounts receivable activities, as well as company payroll and other routine financial operations
- Monitoring company performance against financial performance forecasts and "key performance indicators" (KPIs) included in the Strategic Plan. This included implementing corrective actions to better assure actual performance matches forecasts and benchmarks.
- Monitoring overall company performance against its Strategic Plan, as defined by performance benchmarks. Responsible for providing annual revisions/updates to the Clear Medical Strategic Plan.

1993 - April 1996 Franciscan Health System (FHS), Aston, PA

Vice President, Research and Development

Responsible for FHS research and development. This included all research to support focused technology and other studies. Selected studies included:

- Stereotactic breast biopsy technology
- Minimally invasive surgery technology
- Advanced healthcare practitioners
- Alternative medicine (healing/wholistic medicine)
- Genetic engineering
- Patient-focused care

Responsible for leadership and staff support to the FHS Technology Steering Committee, a multidisciplinary group, including numerous physicians, that had responsibility for identifying and making technology implementation recommendations across FHS.

Responsible for strategic planning, including the compilation of information, the development of market goals and strategies, and the preparation of focused strategic plans. This also included seminars and workshops to prepare and present plans.

Responsible for compilation, analysis and presentation of quantitative and qualitative information on FHS products, services and markets, including:

- Utilization forecast models, by service line, for each FHS hospital, to model the effect of managed care.
- The development of emergency department care delivery models.
- The development of an ambulatory surgery model.
- Preparation of market share and service line projections.

Responsible for service and program integration/consolidation across 3 FHS-West hospitals, including outsourcing all transcription, saving \$750,000 annually, and consolidating laboratory services, saving \$3 million over five years.

Responsible for the development and implementation of a Community Health Model for FHS organizations.

1988 - 1993 Franciscan Health Services - Washington, Tacoma, WA

Vice President, Research and Development

Responsible for new product and service identification and development, including the development of a research process, the Technology Model, which was later implemented throughout Franciscan Health System.

Studies included:

- Magnetic resonance imaging
- Laser technologies
- Imaging, including ultrasound, SPECT cameras and CT
- Continuous quality improvement models
- Optical disk technologies
- Flow cytometry equipment

Responsible for the feasibility study, design and implementation of an MRI service at 4 FHS-West hospitals, including:

- Business and operations plan development
- Acquisition of three MRI systems and service contracts, which represented over \$8 million in capital and operating expenses
- Recruitment of staff, and day-to-day operational responsibility for the MRI department with an annual budget of \$4 million, for two years

1985 - 1988 Franciscan Health Services - Washington, Tacoma, WA

Director, Planning and Research

Responsible for utilization and financial projections for numerous program/services, as key elements of business plan preparation.

Responsible for all regulatory interface, including all certificate-of-need applications, and work with local and state planning agencies.

Responsible for all utilization and service area forecasts and competitor analysis for annual hospital strategic plans and budgets.

Responsible for all primary and secondary market research, including both internal survey projects, e.g., patient satisfaction surveys, and external research, e.g., large, community-wide, surveys.

1984-1985 Washington State Hospital Commission, Olympia, WA

Associate Director, Program Planning and Research

Responsible for technical and staff management of Program Planning and Research Division for the Hospital Commission, including:

- Design, development and management of the Commission Hospital Abstract Reporting System (CHARS), which is still used to compile and analyze patient discharge data from every hospital in the state.
- Design and development of target revenue estimates for statewide hospital revenues, required by the Washington Legislature. This task required compilation and analysis of very large data sets containing cost and revenue data for each Washington hospital.

- Development and implementation of charity care definitions and policies across all Washington hospitals.
- Management of Hospital Commission Certificate-of-Need reviews.

1983 SysteMetrics, Inc., Santa Barbara, CA

Senior Health Care Economist

Responsible for acquisition/development of health care data and forecasting models.

1977-1983 HDR Systems, Santa Barbara, CA

Senior Economist/Project Manager

Project management of numerous military studies. Responsibilities included proposal preparation, study definition, milestone and budget scheduling. This included: Publication scheduling and deadlines; assignment and coordination of interdisciplinary staff input; and technical review and edit.

Developed and implemented econometric forecasting models. These models forecast key economic and demographic parameters, e.g., employment/unemployment, wage levels, and population, for a defined geographic region.

Responsible for development and analysis of other economic technical studies, including development and use of regional inter-industry (input-output) models.

1971-1977 University of Washington, Seattle, WA

Instructor

Taught courses in micro and macroeconomics.

Computer Language Experience

Statistical Analysis System (SAS)

Statistical Package for the Social Sciences (SPSS)

STATA

Access

Honors and Awards

Phi Beta Kappa

Omicron Delta Epsilon (Economics Honor Society)

Magna Cum Laude Graduate

Memberships

American College of Health Executives

Washington State Hospital Association

Published Articles and Presentations

Publications

“Developing A Model for Technology Assessment,” Frank Fox, Ph.D. and Ellen Barron, Health Progress, pages 50-58, January-February 1993.

“Linking Technology with Strategic and Financial Plans: A Case Study of Franciscan Health System,” Frank Fox, Ph.D. and Ellen Barron, American Hospital Association, Hospital Technology Special Report, Volume 14, Number 11, September 1995.

Presentations

“Assessing Marketplace Impact of Future Clinical Technologies,” Technology and Healthcare Marketing--Future Vision Conference, The Alliance for Healthcare Strategy and Marketing, November 10-12, 1996.

“Smart Technology,” Real Solutions for Healthcare Materials Management—Annual Conference, American Society for Healthcare Materials Management, August 11-13, 1996.

“Smart Technology,” 16th Annual Meeting—Strategy Forum, Society for Healthcare Planning and Marketing, American Hospital Association, April 24-27, 1994.